



South Coast Air Quality Management District

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City of San Bernardino
201 North E Street, Suite 301
San Bernardino, CA 92401

**Draft Environmental Impact Report (Draft EIR) for the Proposed Hillwood
Warehouse Distribution Facility tentative Parcel Map No. 17375**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC060609-01
Control Number

Construction Emissions

Construction Mitigation Measures

1. On page III-43, the lead agency lists mitigation measures including cooled exhaust recirculation (EGR) and diesel particulate filters to reduce emissions from construction equipment. It is recommended that the lead agency investigate the availability of aqueous diesel fuel, cooled EGR, diesel particulate filters, lean NO_x catalysts, and diesel oxidation catalysts and demonstrate that they are available for the proposed project. Currently, the availability of these technologies is relatively limited, so they may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the low emission technologies, the lead agency should turn off these mitigation measures in the URBEMIS2002 computer model and not take credit for control efficiencies associated with them.
2. In addition to the short-term (construction) mitigation measures proposed in the Draft EIR starting on page III-42, the SCAQMD recommends that the lead agency consider modifying the following mitigation measure and consider additional mitigation measures to further reduce construction oxides of nitrogen (NO_x) and PM₁₀ fugitive dust air quality impacts from the project, if applicable and feasible:

Page III-44

- all construction grading operations and earth moving operations shall cease when winds (wind speeds as instantaneous gusts) exceed ~~30~~ 25 miles per hour;

Page III-45

- ~~operate street sweepers on paved roads and parking areas~~ all streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks or whenever visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- Re-establish ground cover on construction site through seeding and watering or other appropriate means (state period: for example, inactive for ten days or more);
- provide a flag person during all phases of construction to ensure safety and maintain smooth traffic flow-at construction sites, ~~as necessary~~;

NO_x – Recommended Additions:

- Prohibit material delivery heavy-duty truck idling in excess of five minutes.
- Reroute construction trucks away from congested streets or sensitive receptor areas.

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, or other retrofit technologies, etc.

PM10 – Recommended Additions:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

Localized Significance Thresholds

4. In the project description under surrounding land uses, the lead agency describes several sensitive receptors, e.g., two motels, residential areas, parks, several public and private elementary and middle schools, a community hospital, etc., but does not include the distances from the proposed project site to the sensitive receptors listed on page I-6, II-2 and II-3. Because the proposed site could be located less than a quarter-mile from these sensitive receptors, a localized air quality analysis may be warranted to ensure that the people living in or using these land uses are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

Cancer Risk Assessment

5. Since the California Air Resources Board has designated diesel particulate emissions as a toxic air contaminant and the proposed industrial warehouse project includes potential emissions from diesel trucks idling and queuing, the lead agency should evaluate the associated cancer risks from the diesel particulate emissions at the proposed project.

The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be used to perform a health risk assessment based on the characteristics currently known for the project. It is, therefore, recommended that the lead agency perform a mobile source health risk assessment for the proposed project, which includes the results in the Final EIR. This document can be downloaded from AQMD's CEQA web pages at the following URL: http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc .

The HRA Guidance document also contains a list of mitigation measures that are specifically recommended to be used to mitigate diesel exhaust emissions, if applicable and feasible:

Potential Mitigation Measures from the SCAQMD Health Risk Assessment Guidance
for Analyzing Cancer Risks from Mobile Source Diesel Emissions

Truck Idling Facilities

- Provide a minimum buffer zone of 300 meters (roughly 1,000 feet) between truck traffic and sensitive receptors;
- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Develop park and ride programs;
- Restrict truck idling;
- Restrict operation to “clean” trucks;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Use ‘clean’ street sweepers;
- Pave roads and road shoulders;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.
- Require or provide incentives to use low-sulfur diesel fuel with particulate traps; and
- Conduct air quality monitoring at sensitive receptors.

In addition, a copy of the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" will be sent to you directly from WRCOG. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions. Any questions pertaining to the Guidelines can be directed to WRCOG at (951) 955-7985.

CO Hotspot Analysis

6. In Table III-7 Year 2025 Cumulative Impacts with Improvements V/C Ratio and Level of Service in the PM Peak Hour, the intersections listed below show a decline in the level of service that would warrant a CO hotspots analysis. The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.

- University Parkway (NS) at Varsity Avenue that shows a decline in LOS during the PM peak hour from C to D;
- University Parkway (NS) at Kendall Drive (EW) shows a decline in LOS during the PM peak hour from C to D;

Please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address: <http://www.dot.ca.gov/hq/env/air/coprot/htm>.

Operational Emissions

7. In the Final EIR, the SCAQMD recommends that the lead agency address the following issues:
- The lead agency should clarify in the Final EIR whether the 50-mile average trip length figure used in estimating operational air quality impacts (Appendix J in Table 5D (Diesel Truck Exhaust Emission at Project Buildout (pounds per day)) on page 16) is one-way or round-trip mileage.
 - The lead agency estimates the average trip length to be 50 miles but offers no detailed explanation for that assumption (including projected destinations, distances, etc.), which seems low since vehicles and trucks could be traveling from the proposed warehouse site to destinations in or out of the South Coast Air Basin easily exceeding by a wide margin the 50-mile estimate. The lead agency would then be substantially underestimating the operational air quality impacts that could also underestimate the health risk impacts from the diesel particulates resulting from the increased vehicle trips and mileage impacts in the Draft EIR.

Operational Mitigation Measures

8. Because project-specific operational air quality impacts from the proposed project are estimated to exceed the established SCAQMD daily significance thresholds, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce operational air quality impacts from the project, if applicable and feasible:

Recommended Additions:

- Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site.
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Design the warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs.
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Alternative fueled off-road equipment.